

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

FILED

AUG 17 2022

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY ICM, DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

GORDON BELLAMY, JR.,

Defendant.

No.

CR 22-350 JD

Violations: 18 U.S.C. § 1343
18 U.S.C. § 1030(a)(2)(B)
18 U.S.C. § 1028A(a)(1)

INDICTMENT

The Federal Grand Jury charges:

Introduction

At all times relevant to this Indictment:

1. AAR Corporation ("AAR") was an aviation services provider that operated an aircraft repair facility at Will Rogers World Airport in Oklahoma City, Oklahoma.
2. Ally Aerospace Services, LLC ("Ally") was a company contracted to provide aircraft maintenance crews at the AAR facility.
3. **GORDON BELLAMY, JR. ("BELLAMY")** was a resident of Yukon, Oklahoma and began employment with Ally in July 2018 as an aircraft maintenance mechanic. In or around October 2018, he was promoted to a supervisory role overseeing technicians assigned to an Ally aircraft panel crew. The panel crew was responsible for removing and reattaching access panels for aircraft maintenance.

4. Federal Aviation Administration (“FAA”) regulations required supervising employees to be certificated Airframe and Powerplant (“A&P”) mechanics.

5. The FAA was a department or agency of the United States within the Department of Transportation. It maintained the Civil Aviation Registry website. The website database was located in Oklahoma City, Oklahoma and contained certificate records for all A&P mechanic licenses. The database was accessible to FAA certificate holders online via the Airmen Services Account. Certificates ordered via the Airmen Services Account website were shipped to the recipients from California.

COUNT 1
(Wire Fraud)

6. The Federal Grand Jury incorporates paragraphs 1-5 by reference.

The Scheme to Defraud

7. Beginning in or about October 2018 until March 2019, in the Western District of Oklahoma and elsewhere, **BELLAMY** knowingly devised, intended to devise, and executed a scheme and artifice to defraud Ally in a material manner and to obtain money from Ally by means of materially false and fraudulent pretenses, representations, and promises by representing to Ally that he was a fully certificated A&P Mechanic when in fact he was not, in order to obtain and retain his position as a supervisor over Ally aircraft panel crews.

8. It was part of the scheme to defraud that:

a. **BELLAMY** advised an employee of AAR that he had an A&P certificate, but it had burned in a house fire. **BELLAMY** further advised the certificate number was ***2941.

b. In or about October 2018, **BELLAMY** presented the AAR training department with a letter showing he had applied for a replacement A&P Mechanic's certificate that would be sent by mail. On or about November 2, 2018, **BELLAMY** presented the AAR training department with a printed copy of an A&P certificate number ***2941, belonging to G.A.B., bearing an altered date of birth of **-*-1982.

c. **BELLAMY** retained his supervisory position until March 2019 when Ally employees inquired of the FAA directly and learned the correct date of birth for the A&P certificate number ***2941 was **-*-1957. Ally contacted **BELLAMY** regarding the date of birth discrepancy, and **BELLAMY** failed to return calls or messages, causing his employment to be terminated.

Wires in Furtherance of the Scheme

9. On or about October 12, 2018, in the Western District of Oklahoma,
----- **GORDON BELLAMY, JR.,** -----
for the purpose of executing the above-described scheme to defraud in a material manner and to obtain money by means of materially false and fraudulent pretenses, representations, and promises, and with intent to defraud, knowingly caused signals to be transmitted by means of wire communications in interstate commerce. Specifically, **BELLAMY** accessed the FAA Civil Aviation Registry website via the Airmen Services Account in order to access the account belonging to G.A.B. **BELLAMY** requested to change G.A.B.'s

password and provided G.A.B.'s full name, date of birth of **-*-1957, and G.A.B.'s A&P Mechanic's certificate number ***2941. **BELLAMY** changed the password and requested to change the associated mailing address from G.A.B.'s address in Alabama to one controlled by **BELLAMY** in Kissimmee, Florida. **BELLAMY** then requested a replacement A&P Mechanic's certificate to be mailed to the Florida address.

All in violation of Title 18, United States Code, Section 1343.

COUNT 2
(Computer Access Fraud)

10. The Federal Grand Jury incorporates paragraphs 1-5 and 7-9 by reference.

11. On or about October 12, 2018, in the Western District of Oklahoma and elsewhere,

----- **GORDON BELLAMY, JR.** -----
intentionally accessed a computer without authorization, and thereby obtained information from a department and agency of the United States, namely the Federal Aviation Administration, and the offense was committed in furtherance of a criminal and tortious act, specifically 18 U.S.C. §§ 1343 and 1028A(a)(1) in violation of the laws of the United States.

All in violation of Title 18, United States Code, Section 1030(a)(2)(B), the penalty for which is found at Title 18, United States Code, Section 1030(c)(2)(B)(ii).

COUNT 3
(Aggravated Identity Theft)

12. The Federal Grand Jury incorporates paragraphs 1-5, 7-9, and 11 by reference.

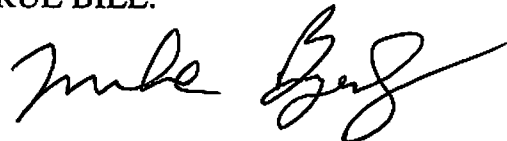
13. On or about October 12, 2018, in the Western District of Oklahoma and elsewhere,

----- **GORDON BELLAMY, JR.** -----

did knowingly use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c)(5)—specifically, the offense of wire fraud as set forth in Count 1 of this Indictment, knowing that the means of identification belonged to another person. In particular, **BELLAMY** used the name, date of birth, and an FAA A&P Mechanic's certificate belonging to G.A.B., whom he knew to be a real person.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

A TRUE BILL:



FOREPERSON OF THE GRAND JURY

ROBERT J. TROESTER
United States Attorney



DANIELLE LONDON
Assistant United States Attorney